

June 1, 2010

Kathleen Harder
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

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Dear Ms. Harder:

As an environmental organization that has long fought to restore the Sacramento-San Joaquin Delta as an estuary of international significance, we have followed with increasing interest the growing body of science on the role of nutrients and changes in nutrients can play in affecting the food web that numerous endangered species depend upon. The permit renewal process for the Sacramento Regional Wastewater Treatment Plant represents a key decision for the Central Valley Regional Water Quality Control Board in establishing its role in managing nutrients as a critical element of overall water quality in the Delta.

The Sacramento Regional Wastewater Treatment Plant is one of the largest wastewater dischargers in the estuary. And it is one of a declining number of wastewater treatment plants that has not yet been required to upgrade to more advanced forms of treatment that would eliminate or substantially reduce levels of ammonium and other pollutants from entering the Sacramento River. The direct toxicity of a pollutant such as ammonium should not be the sole measurement of its effects on the Delta. There is growing evidence that ammonium inhibits the production of pelagic organisms, a critical food supply of native fisheries. We encourage you to review this evidence and factor it into your decision-making process.

Further, we encourage the Sacramento Regional Sanitation District to continue to explore opportunities for large scale water recycling. Such recycled water projects offer many potential benefits. Irrigating lands with tertiary treated recycled water instead of groundwater could help raise groundwater levels in southern Sacramento County and even help restore flows in the Cosumnes River to levels necessary to help restore its run of Chinook salmon. This kind of innovative "reuse" of water could also help support and restore habitat for endangered species like the Swainson's hawk and Greater Sandhill Crane. We believe that creative solutions including recycling water as part of overall Delta restoration efforts can achieve multiple goals: reducing chemical loading in the Delta; better meeting regional water management needs; improving overall water quality; and delivering a long-term sustainable approach in restoring the Delta. We hope that these suggestions will be taken into consideration in the Regional Board's deliberations.

Sincerely,



Leo Winternitz
Delta Project Director